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Commission's Secretary,
Office of the Secretary,
Federal Communications Commission Headquarters
445 12th St., SW,
Room TW-A325,
Washington, DC 20554

January 26th 2016

Regarding: 15-138 NPRM on Mobile use in bands above 24GHz

Dear Sirs,

As a company specialising in the potential use of higher frequency bands we have been following your above consultation with interest. While aeronautical mobile services are expressly considered in FCC docket 13-66A1, the more recent docket 15-138 considers mobile usage more generally. We note your commentary in clause [REDACTED] and wish to provide our views on the potential of the [REDACTED] bands for aeronautical mobile services.

We have submitted this letter in confidence due to the commercially sensitive nature of [REDACTED].

The general interest in these bands has increased significantly in the recent past. This interest has not been confined to mobile operations as envisaged by equipment manufacturer's for 5G services. In particular, [REDACTED] have progressed technology developments of high bandwidth point to point data links. [REDACTED] to the FCC is evidence of [REDACTED] fits with this technology development.

We are currently working [REDACTED].

The medium term technology development plan is [REDACTED].

The aviation market has [REDACTED] and regulators in other jurisdictions.

Having a supportive regulatory environment for the [REDACTED] bands is an important aspect of maintaining the necessary [REDACTED]. Given the highly regulated environment and long product lead times of the aviation industry, this supportive environment is of greater significance than usual in other industries.

The [REDACTED] characteristics of this frequency band combined with [REDACTED] provide an environment [REDACTED] which is more simplified than general mobile operations. This simplified environment allows for a coordination process between fixed and aeronautical mobile operations and between federal, radio astronomy and non-federal users. Some of the characteristics of our technology are -

- [REDACTED]

We suggest the FCC consider possible rulemakings [REDACTED].

We have shared the enclosed appendix. This appendix provides further overview details of the technology development by Aeronet. This is to provide a more complete understand of the operation of this aviation connectivity system.

We feel our technology development in the [REDACTED] and therefore its development should be supported. For example –

- [REDACTED]

Work to date has shown the technology shall be capable of [REDACTED].

In summary, we feel the FCC such consider the interest in and the technology development of [REDACTED] for aeronautical mobile operations [REDACTED]. As such the FCC should [REDACTED]. This would result in a supportive regulatory environment to allow the continued development of very high bandwidth services for aviation consumers.

Your sincerely,

A handwritten signature in black ink, appearing to read "Ivor Fitzpatrick". The signature is fluid and cursive, with a large initial "I" and "F".

Ivor Fitzpatrick
Director
For an on behalf of
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Appendix: Confidential Information regarding Aeronet technology development

[REDACTED]